

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
Eastern Division

R.P.
&
D.P.

4:22-CV-874

JURY TRIAL DEMANDED

Plaintiffs,

v.

ADAM LAWRENCE SMITH,

Defendant.

COMPLAINT

COMES NOW Plaintiffs RP and DP (collectively “Plaintiffs”), and for their Complaint against Defendant Adam Lawrence Smith (“Defendant”) state:

COUNT I – Negligent Infliction of Emotional Distress

1. This action relates to Defendant having illegal sexual contact with a minor child who also happens to be his first cousin and also supplying her with illicit substances and/or drugs and/or coercing her to consume illicit substances and drugs.
2. Plaintiff RP and DP are residents of the State of Missouri.
3. Plaintiffs are married to each other and, relevant to this suit, have a daughter.
4. Defendant is a resident of the State of Kansas.
5. Venue is proper in this Court in that a substantial amount of the conduct occurred within the Eastern District of Missouri.
6. This Court has jurisdiction over this matter pursuant to diversity jurisdiction in that the Plaintiffs and Defendant are residents of separate states and the amount in controversy is in excess of \$75,000.00.
7. This Court has personal jurisdiction over Defendant for the following reasons:

- a. Defendant has substantial and systemic contacts with Missouri;
 - b. The tortious acts giving rise to this matter occurred in the State of Missouri;
and/or
 - c. Defendant purposefully availed himself of the forum in that he committed the tortious acts here, targeted Plaintiffs and their daughter knowing they lived here and while he was present in the State of Missouri.
8. Defendant is Plaintiffs nephew.
9. Plaintiffs' daughter is Defendant's first cousin.
10. In year 2020, when Plaintiffs' daughter was 16 years old, Defendant began a sexual relationship with Plaintiffs' daughter. At the time the sexual contact began, Defendant was 26 years old.
11. From the age of 16 to present, Defendant has continued to have sexual contact with Plaintiffs' daughter including one or more times when she was under the lawful age of consent.
12. Upon information and belief, Defendant has manipulated and coerced Plaintiffs' daughter to travel to other States within the United States in an attempt to marry Plaintiffs' daughter in that it is illegal for Defendant to marry his first cousin in the State of Missouri.
13. Upon information and belief, Defendant has also supplied Plaintiffs' daughter with numerous illicit substances and/or drugs and coerced Plaintiffs' daughter into consuming said substances and/or drugs.
14. Defendant's aforementioned conduct is extreme and outrageous.

15. Defendant's aforementioned conduct was intentional, reckless, negligent, and/or tortious.

16. The Defendant should have realized that his conduct involved an unreasonable risk of causing Plaintiff RP and/or Plaintiff DP emotional distress.

17. Defendant's conduct caused Plaintiff RP medically diagnosable and medically significant emotional distress.

18. Defendant's conduct caused Plaintiff DP medically diagnosable and medically significant emotional distress.

WHEREFORE Plaintiffs respectfully request judgment in their favor and against Defendant for a fair and reasonable amount in excess of Seventy-Five Thousand Dollars (\$75,000.00), for pre-judgment interest and post-judgment interest, for their costs herein incurred, and for such other and further relief as the Court deems just and proper under the circumstances.

ATTESTATIONS

1. Attestation of Plaintiff RP

I, Plaintiff RP, have reviewed this Complaint and swear and attest that the information contained herein is true and accurate to the best of my knowledge.




Plaintiff RP

STATE OF Missouri)
) SS
COUNTY OF St. Louis)

Subscribed and sworn to before me this 22 day of August, 2022.





Notary Public

2. Attestation of Plaintiff DP

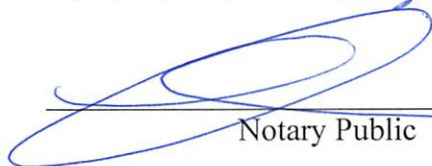
I, Plaintiff DP, have reviewed this Complaint and swear and attest that the information contained herein is true and accurate to the best of my knowledge.



Plaintiff DP

STATE OF Missouri)
) SS
COUNTY OF St. Louis)

Subscribed and sworn to before me this 22 day of August, 20 22.



Notary Public

My Commission Expires:



PLAINTIFFS DEMANDS TRIAL BY JURY

Respectfully Submitted

THE O'BRIEN LAW FIRM, PC

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